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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 RICHARD KADREY, *et al.*,
13 Individual and Representative Plaintiffs,
14 v.
15 META PLATFORMS, INC., a Delaware
16 corporation;
17 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF NIKKI VO IN SUPPORT
OF DEFENDANT META PLATFORM INC.'S
MOTION TO SEAL RE: ORDER OF JANUARY
8, 2025 [DKT. 373]**

1 I, Nikki Vo, hereby declare:

2 1. I am a Director & Associate General Counsel for Defendant, Meta Platforms, Inc.
3 (“Meta”). I have personal knowledge of the facts set forth in this declaration and, if called to testify
4 as a witness, could and would testify competently thereto.

5 2. I make this declaration in support of Defendant Meta Platform Inc.’s Motion to Seal
6 re: Order of January 8, 2025 [Dkt. 373] (“Motion to Seal”), considering and in accordance with the
7 Court’s guidance.

8 3. **First**, regarding materials filed in connection with Plaintiffs’ Motion for Leave to
9 File a Third Consolidated Amended Complaint (“Plaintiffs’ Motion”) (unredacted materials sealed
10 at Dkt. 301), the Motion to Seal seeks to have the following documents partially sealed:

Document	Sealing Request
Vo Ex. A – Exhibit 1 to Declaration of Joshua M. Stein ISO Plaintiffs’ Motion (“Stein Motion Declaration”) (Dkt. 301-3)	Redacted Highlighted Portions
Vo Ex. B – Exhibit 2 to Stein Motion Declaration (Dkt. 301-4)	Redacted Highlighted Portions
Vo Ex. C – Exhibit 7 to Stein Motion Declaration (Dkt. 301-9)	Redacted Highlighted Portions
Vo Ex. D – Exhibit 8 to Stein Motion Declaration (Dkt. 301-10)	Redacted Highlighted Portions
Vo Ex. E – Exhibit 9 to Stein Motion Declaration (Dkt. 301-11)	Redacted Highlighted Portions

21 4. The limited information requested to be sealed in Dkts. 301-3, 301-9, 301-10, and
22 301-11 contains hyperlinks or file paths (e.g., links to access Meta’s internally stored documents
23 and data), pointing to Meta’s confidential and proprietary information and sensitive features of its
24 internal systems, which are maintained as confidential and with restricted access in the ordinary
25 course of its business, and which is not generally known to the public or Meta’s competitors. The
26 hyperlinks and file paths have been redacted in a randomized way to avoid disclosure. Such
27 confidential and proprietary information about Meta’s infrastructure may increase the risk of cyber
28 security threats or breaches as third parties may seek to gain access to and use the information to

1 compromise and intrude upon Meta’s internal systems and other confidential information.

2 5. The limited information requested to be sealed in Dkts. 301-3, 301-4, 301-9, 301-
3 10, and 301-11 contains the email addresses for Meta’s individual employees, who are not parties
4 to the case. Such information has been redacted to protect the employees’ privacy and to avoid the
5 risk of third parties’ use of the information for automated or unwanted solicitation or contact.

6 6. The limited information requested to be sealed in Dkt. 301-9 includes information
7 protected by confidentiality and non-disclosure obligations and agreements between Meta and third
8 parties. Disclosure of such information may put the third parties’ confidential information at risk
9 and pose a competitive disadvantage to those parties who obtained promises of confidentiality from
10 Meta and are not parties to this lawsuit.

11 7. **Second**, regarding materials filed in connection with Meta’s Opposition to
12 Plaintiffs’ Motion (“Meta’s Opposition”) (unredacted materials sealed at Dkt. 328), the Motion to
13 Seal seeks to have the following documents entirely or partially sealed:

14 Document	Sealing Request
15 Vo Ex. F – Exhibit A to Declaration of Kathleen Hartnett 16 ISO Meta’s Opposition (“Hartnett Declaration”) (Dkt. 328- 5)	Redacted Highlighted Portions
17 Vo Ex. G – Exhibit B to Hartnett Declaration (Dkt. 328-6)	Redacted Highlighted Portions
18 Vo Ex. H – Exhibit F to Hartnett Declaration (Dkt. 328- 19 10)	Redacted Highlighted Portions
20 Vo Ex. I – Exhibit G to Hartnett Declaration (Dkt. 328-11)	Redacted Highlighted Portions
21 Vo Ex. J – Exhibit H to Hartnett Declaration (Dkt. 328-12)	Redacted Highlighted Portions

22 8. The information in Dkts. 328-5 and 328-6 (along with Dkt. 301-9, above), are
23 different versions of the same document, the redacted portions of these documents and those in
24 Dkt. 328-12, comprise information protected by confidentiality and non-disclosure obligations and
25 agreements between Meta and third parties. Disclosure of such information may put the third
26 parties’ confidential information at risk and pose a competitive disadvantage to those parties who
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28

1 obtained promises of confidentiality from Meta and are not parties to this lawsuit.

2 9. The limited information requested to be sealed in Dkts. 328-5, 328-6, 328-11, and
3 328-12 contains hyperlinks or file paths (e.g., links to access Meta's internally stored documents
4 and data), pointing to Meta's confidential and proprietary information and sensitive features of its
5 internal systems, which are maintained as confidential and with restricted access in the ordinary
6 course of its business, and which is not generally known to the public or Meta's competitors. The
7 hyperlinks and file paths have been redacted in a randomized way to avoid disclosure. Such
8 confidential and proprietary information about Meta's infrastructure may increase the risk of cyber
9 security threats or breaches as third parties may seek to gain access to and use the information to
10 compromise and intrude upon Meta's internal systems and other confidential information.

11 10. The limited information requested to be sealed in Dkts. 328-5, 328-6, 328-10, and
12 328-11 also contains the email addresses for Meta's individual employees, who are not parties to
13 the case. Such information has been redacted to protect the employees' privacy and to avoid the
14 risk of third parties' use of the information for automated or unwanted solicitation or contact.

15 11. **Third**, regarding materials filed in connection with Plaintiffs' Reply in support of
16 Plaintiffs' Motion ("Plaintiffs' Reply") (unredacted materials sealed at Dkt. 346), the Motion to
17 Seal seeks to have the following documents entirely or partially sealed:

Document	Sealing Request
18 Vo Ex. K – Exhibit A to the Declaration of Joshua M. 19 Stein ISO Plaintiffs' Reply ("Stein Reply Declaration") 20 (Dkt. 346-2)	Redacted Highlighted Portions
21 Vo Ex. L – Exhibit B to Stein Reply Declaration (Dkt. 22 346-3)	Redacted Highlighted Portions
23 Vo Ex. M – Exhibit C to Stein Reply Declaration (Dkt. 24 346-4)	Redacted Highlighted Portions
25 Vo Ex. N – Exhibit D to Stein Reply Declaration (Dkt. 346-5)	Redacted Highlighted Portions

26 12. The limited information requested to be sealed in Dkt. 346-3 contains information
27 protected by confidentiality and non-disclosure obligations and agreements between Meta and third
28 parties. Disclosure of such information may put the third parties' confidential information at risk

1 and pose a competitive disadvantage to those parties who obtained promises of confidentiality from
2 Meta and are not parties to this lawsuit.

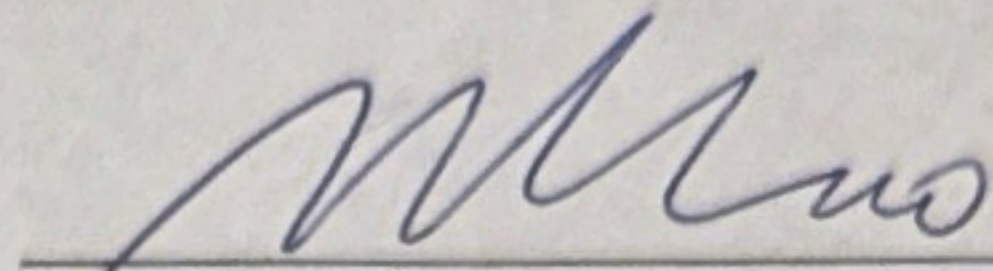
3 13. The limited information requested to be sealed in Dkts. 346-3, and 346-5 contains
4 hyperlinks or file paths (e.g., links to access Meta's internally stored documents and data), pointing
5 to Meta's confidential and proprietary information and sensitive features of its internal systems,
6 which are maintained as confidential and with restricted access in the ordinary course of its
7 business, and which is not generally known to the public or Meta's competitors. The hyperlinks
8 and file paths have been redacted in a randomized way to avoid disclosure. Such confidential and
9 proprietary information about Meta's infrastructure may increase the risk of cyber security threats
10 or breaches as third parties may seek to gain access to and use the information to compromise and
11 intrude upon Meta's internal systems and other confidential information.

12 14. The limited information requested to be sealed in Dkts. 346-2, 346-3, 346-4 and
13 346-5 also contains the email addresses and contact information for Meta's individual employees,
14 who are not parties to the case. Such information has been redacted to protect the employees'
15 privacy and to avoid the risk of third parties' use of the information for automated or unwanted
16 solicitation or contact.

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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct

3 Executed in Oakland, California on this 13th day of January, 2025.

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Nikki Vo